



March 6, 2014

VIA ELECTRONIC FILING AND REGULAR MAIL

Honorable Dickinson R. Debevoise United States District Court, District of New Jersey M.L. King, Jr. Federal Bldg. & U.S. Courthouse Room 5083 50 Walnut Street Newark, NJ 07102

David R. Kott Partner T. 973.639.2056 F. 973.624.7070 dkott@mccarter.com Re: Walsh Securities, Inc. v. Cristo Property Management, Ltd., et al. United States District Court for the District of New Jersey Civil Action No. 97-cv-3496 (DRD) (JAD)

Dear Judge Debevoise:

McCarter & English, LLP Four Gateway Center 100 Mulberry Street Newark, NJ 07102-4056 T. 973.622.4444 F. 973.624.7070 www.mccarter.com

We represent the defendant, Commonwealth Land Title Insurance Company, in this case. Pro se defendant, Richard Calanni, has sent a February 20, 2014 letter to Your Honor [Document 587 Filed 02/24/14] with respect to Judge Dickson's February 18, 2014 Report and Recommendation on Defendant Richard Calanni's Informal Request to Reopen Matter. [Document 586 Filed 02/18/14]. It is my understanding that the Court may treat Mr. Calanni's February 20, 2014 letter as an objection to Judge Dickson's Report and Recommendation. If that is the case, then please consider this letter our response to Mr. Calanni's objection to Judge Dickson's Report and Recommendation. I have spoken to Edward J. Hayes, Jr., Esq., the attorney for co-defendants, Nations Title Insurance of New York Inc. and Fidelity National Title Insurance Company of New York, and he joins in this letter.

BOSTON

HARTFORD

NEW YORK

NEWARK

PHILADELPHIA

STAMFORD

WASHINGTON, DC

WILMINGTON

We believe Judge Dickson's Report and Recommendation was correctly decided and should be affirmed. We rely upon the arguments made in our October 28, 2013 letter to Your Honor [Document 580 Filed 10/28/13] and in our February 4, 2014 letter to Judge Dickson [Document 584 Filed 02/04/14].

Respectfully submitted,

David R. Kott

DRK/tas

cc: Honorable Joseph A. Dickson (via electronic filing & regular mail) Robert A. Magnanini, Esq. (via electronic filing & regular mail) Richard Calanni, Pro Se (via electronic filing, certified mail, r.r.r. & regular mail)

ME1 17358314v.1